

Exhibit D

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ARIEL INVESTMENTS, LLC)	
)	
Plaintiff,)	
)	
v.)	Case No. 15-cv-3717
)	
ARIEL CAPITAL ADVISORS LLC)	
)	
Defendant.)	

Plaintiff's Supplemental Answers to Defendant's First Set of Interrogatories

Plaintiff Ariel Investments, LLC, ("Ariel Investments" or "Plaintiff") supplements its response to Defendant Ariel Capital Advisors LLC's ("Ariel Capital") First Set of Interrogatories dated January 27, 2016, pursuant to Federal Rules of Civil Procedure 26 and 33 as follows:

General Objections

The following General Objections are expressly incorporated by reference into Plaintiff's responses to each of the Interrogatories set forth below. Each of Plaintiff's responses is made without waiving these General Objections.

A. Plaintiff objects to these Interrogatories to the extent that they seek documents or information protected from discovery by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege. To the extent these Interrogatories seek privileged materials created since the beginning of this litigation, April 28, 2015, solely for the purpose of this litigation, Plaintiff will not identify those materials on a privilege log.

B. Plaintiff objects to these Interrogatories to the extent they seek documents or information that contain confidential or proprietary information belonging to Plaintiff unless all

such documents and information are produced pursuant to the confidentiality order entered by the Court on August 10, 2015. (Dkt. 38.)

C. Plaintiff objects to these Interrogatories to the extent that the accompanying three pages of “Instructions” and “Definitions” purport to impose upon Plaintiff duties or responsibilities greater than or different from those imposed by the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the Northern District of Illinois, and the orders of this Court as exemplified below:

a. Plaintiff objects to definitions of “You,” or “Your” as they purport to include all agents, employees, and consultants, among others. These definitions are overly broad, burdensome, and impracticable.

b. Plaintiff objects to Instruction No. 3 because it purports to require information on a privilege log beyond that which is required by Fed. R. Civ. P. 26(b)(5)(A). Plaintiff will log withheld documents according to Rule 26(b)(5)(A).

c. Plaintiff objects to the definition of “document” because Rule 34 already defines that term. Plaintiff will respond to these Interrogatories in light of the definition of document provided in Rule 34.

Answers and Objections

2. Identify each product and/or service that you have provided or presently provide or offer for sale for use by consumers and for each, describe the product or service in detail and state when the product or service was first made available to consumers.

ANSWER: Ariel Investments objects to this Interrogatory as vague and ambiguous as the phrase “and/or” is not a proper English word and has an ambiguous meaning. Subject to and without waiving its general and specific objections, Ariel Investments states that it offers, without limitation, the following products and services:

- Six current mutual funds:
 - Ariel Fund (Investor Class November 6, 1986 – present; Institutional Class December 30, 2011 – present)
 - Ariel Appreciation Fund (Investor Class December 1, 1986 – present; Institutional Class December 30, 2011 – present)
 - Ariel Discovery Fund (Investor Class January 31, 2011 – present; Institutional Class December 30, 2011 – present)
 - Ariel Focus Fund (Investor Class June 30, 2005 – present; Institutional Class December 30, 2011 – present)
 - Ariel Global Fund (Investor Class December 30, 2011 – present; Institutional Class December 30, 2011 – present)
 - Ariel International Fund (Investor Class December 30, 2011 – present; Institutional Class December 30, 2011 – present)
- One former mutual fund:
 - Ariel Premier Bond Fund (Investor Class October 1, 1995 – June 10, 2005; No Institutional Class)
- Separately managed accounts in the following strategies or products:
 - Small-cap value (September 30, 1983 – present)
 - Small-/mid-cap value (December 31, 2000 – present)
 - Mid-cap value (March 31, 1990 – present)
 - Focused value strategy (March 31, 2005 – present)
 - Micro-cap value (July 31, 2002 – present)
 - Small-cap deep value (October 31, 2013 – present)
 - Global strategy (December 31, 2011 – present)
 - International (developed markets) (December 31, 2011 – present)
 - International (developed & emerging markets) (December 31, 2011 – present)

With regard to the remaining information requested by this Interrogatory, Ariel Investments answers this Interrogatory by producing business records pursuant to Federal Rule of Civil Procedure 33(d). Ariel Investments will make this production within 30 days.

Supplemental Answer:

Descriptions of Ariel Investments' separately managed accounts can be found on its website at <https://www.arielinvestments.com/ariel-separate-accounts/>. Ariel Investments further answers this Interrogatory by producing business records bearing Bates Nos. AI000361-000411; AI000739-000771; and pursuant to Federal Rule of Civil Procedure 33(d).

Dated: May 10, 2016

By: /s/ Arthur Gollwitzer III

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Certificate of Service

I, Arthur Gollwitzer III, an attorney of record in this matter, certify that on May 10, 2016, I caused a copy of the following document:

Plaintiff's Supplemental Answers to Defendant's First Set of Interrogatories

to be served upon the following counsel of record via electronic mail delivery:

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